

REMARKS/ARGUMENTS

Claims 1-23 are pending and stand rejected.

Claims 1, 3-4, 9-15, and 17-23 are rejected under 35 U.S.C. §103(a) being unpatentable over United States Patent 6,779,119 to Moshfegui et al. (hereinafter "Moshfegui") in view of United States Patent Application Publication US 2003/0037041 to Hertz and further in view of United States Patent Application Publication US 2004/0054764 to Aderton et. al (hereinafter "Aderton").

Claim 5 is rejected under 35 U.S.C. §103(a) as being unpatentable over Moshfegui in view of Hertz and further in view of Aderton and further in view of United States Patent 5,257,370 to Letwin.

Claims 7-8 are rejected under 35 U.S.C. §103(a) as being unpatentable over Moshfegui in view of Hertz and further in view of Aderton and further in view of United States Patent Application Publication to 2003/0037202 to Kedem et al. (hereinafter "Kedem").

Claim 16 is rejected as being unpatentable over Moshfegui in view of Hertz and further in view of Aderton and further in view of United States Patent 5,678,347 to Omura et al. (hereinafter "Omura").

Claims 10-11 are amended. Claims 1-9 and 12-23 are canceled. New claims 24-37 are added. Support for the new and amended claims can be found throughout the application and, among other places, support can be found with reference to Figs. 2-3, 5, and 7-8 and their corresponding descriptions. No new matter has been added.

Claim 10

Claim 10 recites a system including a management computer and a storage device. The management computer is configured "for transmitting to said storage device one or more first commands containing information for specifying computers in a first group of computers and an access history identifier for each of the specified computers in said first group." The storage device is configured "for maintaining a plurality of access histories for each computer in the first group of computers." Additionally, the storage device is configured such

that "when a computer in said first group of computers specified by said first commands requests data from said storage device, said storage unit records a storage location of the requested data in said disk device as a history that is linked with said access history identifier of said requesting computer specified by said first commands." As discussed below, Applicants respectfully submit that the combination of references cited fails to teach or suggest at least these features.

Moshfegui discusses reducing actual and perceived response times in systems characterized by data access latency. See, Abstract. The Examiner acknowledges that Moshfegui does not disclose the use of a management computer. See, Office Action at pp. 5-6. Therefore, it follows that Moshfegui does not teach or suggest a management computer that transmits first commands containing (1) information for specifying computers in a first group of computer, and (2) an access history identifier for each computer in the first group.

Moshfegui also fails to disclose a storage device that maintains a plurality of access histories for each computer in the first group. Nowhere does the reference teach or suggest maintaining a plurality of access histories for individual computers. Moshfegui does not teach or suggest using an access history identifier to determine which of the plurality of access histories will be used, or that the access history identifier is received in a command from a management computer. In short, Moshfegui does not disclose a management computer, does not disclose a storage device that maintains a plurality of access histories for individual computers, and does not disclose first commands from the management computer that contain an access history identifier used by a storage device to record storage locations of requested data.

Hertz does not cure Moshfegui's deficiencies. Hertz discusses using profiles to guess what information a particular user will find interesting. See e.g., Hertz at [0020]. As best understood, this process is based upon probabilities and predications. In other words, Hertz is not concerned with access history so much as with predicting future access based upon likes and dislikes. See, Hertz at [0216]. This is apparently accomplished by finding the intersection between a user's profile and a profile generated for target objects regardless of whether or not the user has previously accessed a particular target object.

In any event, Hertz does not disclose a management computer that transmits first commands nor does it disclose a storage device that maintains a plurality of access histories for each computer in a group. Hertz similarly fails to teach or suggest that a storage device records history information for a particular computer to an access history determined by an access history identifier received from a management computer. More generally, Applicants respectfully submit that Hertz does not teach or suggest any of the claimed interactions between a management computer and a storage device.

Aderton does not cure the deficiencies of Moshfegui and Hertz. Specifically, Aderton does not teach or suggest a management computer that transmits first commands containing (1) information for specifying computers in a first group of computers, and (2) an access history identifier for each computer in the first group. Aderton does not teach or suggest a storage device that maintains a plurality of access histories for each computer in the first group. Finally, Aderton does not teach or suggest that the storage device records history information for a particular computer to an access history determined by an access history identifier received from a management computer.

For at least the reasons identified above, Applicants respectfully submit that claim 10 is patentable over the combination of cited references. Specifically, whether taken alone or in combination, the cited references fail to teach or suggest each and every claimed feature and thus do not render the claim obvious.

Claims 11, 24-30

Claims 11 and 24-30 depend, directly or indirectly, from claim 10. Each dependent claim incorporates the features and limitations of claim 10 and, therefore, each dependent claim is believed allowable over the cited references for at least the reasons previously discussed.

In addition, dependent claims 11 and 24-30 are patentable based upon their individual limitations. For example, claim 11 recites that the management computer "maintains a schedule for interacting with said first group of computers and said storage device" and that the first and second commands are transmitted according to the schedule. None of the cited

references discloses a management computer that maintains a schedule and that transmits first and second commands to a storage device based upon the schedule.

Claims 24-26 each recite activation conditions that form part of the first commands. None of the cited references discloses the use of activation conditions in connection with commands transmitted from a management computer to a storage device as recited in the claims.

Claim 27 recites "wherein the access histories comprise lists of storage locations corresponding to read requests received directly from one or more of said first group of computers by the storage device." None of the cited references teaches or suggests at least this additional limitation.

Claim 29 recites "wherein the computer identifiers for the first group of computers change from time to time, and wherein the management computer detects these changes and notifies the storage device of the new identifiers." None of the cited references teaches or suggests detecting new identifiers and notifying a storage device as claimed.

Claims 31-37

Claims 31-37 recite features and limitations similar to those discussed above in connection with claims 11 and 24-30. Accordingly, claims 31-37 are also believed allowable over the cited references.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

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PATENT

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 858-350-6100.

Respectfully submitted,



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